

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

----- x

A.A-B. individually and on behalf of N.B., a minor,

Plaintiffs,

**DECLARATION OF
LESLEY BERSON MBAYE**

-against-

No. 24 Civ. _____

NEW YORK CITY DEPARTMENT OF
EDUCATION,

Defendant.

----- x

I, Lesley Berson Mbaye, hereby declare, pursuant to 28 U.S.C. §1746 and subject to the penalties of perjury, that the following statements are true and correct:

1. I am Of Counsel to the Law Office of Michelle Siegel, PLLC, attorneys for the Plaintiff in this action.

2. I make this declaration in support of Plaintiff's motion for temporary, preliminary, and permanent injunctive relief requiring the DOE to fund N.B.'s placement at Shrub Oak International School pending a decision in Plaintiff's administrative due process hearing before the New York City Office of Administrative Trials and Hearings Special Education Hearings Division ("OATH") in case number 287949.

3. The annexed documents have been redacted to protect Plaintiff's and her minor child's personally identifying information pursuant to F.R.C.P. 5.2.

4. Annexed hereto as Exhibit "1" is a true and correct copy of the Findings of Fact and Decision of Impartial Hearing Officer Melanie Goldberg, Esq., dated August 29, 2024, in case no. 275268 concerning the minor N.B.

5. Annexed hereto as Exhibit "2" is a true and correct copy of the Due Process

Complaint Plaintiff filed with OATH on November 7, 2024, designated case number 287949.

Dated: November 22, 2024
New York, New York

/s/
LESLEY BERSON MBAYE